

7 SHANNON RABORN: My name is Shannon Raborn. I'm
8 reading comments on behalf of United States Senator
9 Harry Reid. "I appreciate the opportunity to comment
10 before my fellow Nevadans and the Department of Energy on
11 the Draft Repository and Transportation Supplemental EIS.
12 The DOE is in its third decade trying to show that
13 Yucca Mountain is a suitable site to permanently store
14 nuclear waste. It's telling that they keep generating
15 thousands of pages of data and documents, yet Nevadans and
16 more and more Americans look at this project with
17 skepticism and fear.

18 [I have spent my entire career in the 1
19 United States Senate opposing a Nuclear Waste Repository
20 in Nevada, and like past environmental documents that
21 DOE has published, I see nothing in these NEPA documents
22 suggesting that DOE made the right decision by choosing
23 Yucca Mountain as the nation's nuclear waste dump.

24 The National Environmental Policy Act is
25 designed to disclose the environmental impacts of major
1 federal projects so the public may have a chance to
2 review and comment on them. The purpose of NEPA is to
3 ensure that federal agencies actually take into account
4 potential environmental consequences of projects like
5 the proposed nuclear waste dump before making a decision
6 to go forward.

7 However, it's common knowledge that the
8 Department of Energy has already decided that it wants
9 to build a repository in Nevada, despite the fact that

10 the NEPA process is not over. This is precisely the
11 situation that NEPA and the Nuclear Waste Policy Act
12 intended to avoid.

13 Both NEPA and the Nuclear Waste Policy Act
14 envision that the department would complete research and
15 have sufficient information available before determining
16 that a site is suitable for storing one of the most
17 dangerous substances known to man.

18 Because our federal government made a terrible
19 mistake of ignoring a well thought out process of
20 completing research and designs before choosing a
21 repository site, we are all here today commenting on an
22 EIS that is premature, wholly inadequate, and based on
23 flawed assumptions.] . . . Continued below

24 [It's clear that DOE is attempting to move
25 forward with the repository construction. The
1 department has given us a date, June 30, 2008, that it
2 will submit its license application to the NRC. DOE has
3 no intention of taking into account comments from the
4 public that could prevent it from meeting this arbitrary
5 self-imposed deadline.

6 I am hopeful that DOE will make every effort
7 to review each comment submitted regarding the
8 Draft SEIS's and provide an explanation of how they
9 considered each suggestion or concern.]

10 [As the department noted in its Repository SEIS
11 summary, the Nuclear Waste Policy Act as amended directs
12 the NRC to adopt the department's Final Environmental
13 Impact Statement to the extent practical with no further

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Continued

14 consideration required.

15 This being the case, if the department's Final
16 and Supplemental EIS's are based on incomplete
17 information and flawed assumptions, this means that the
18 NRC could adopt this skewed analysis when deciding
19 whether or not to authorize construction of a nuclear
20 waste dump at Yucca Mountain.]

21 I have four major concerns with the
22 Repository SEIS. [First, the DOE has made numerous 3
23 conclusions in its SEIS based on incomplete design
24 information, despite the fact that Yucca Mountain is a
25 one-of-a-kind project.

1 DOE acknowledges that repository designs could
2 be less than 40 percent complete when it submits its
3 application to NRS. I'm also deeply concerned that DOE
4 is making assumptions that are convenient for securing a
5 license but are not actually feasible in constructing a
6 repository.]

7 Second, [the assumption that DOE will place 4
8 90 percent of all spent nuclear fuel in transportation,
9 aging, and disposal canisters (TADs) lacks foundation,
10 and DOE simply cannot show that nuclear utilities will
11 have the will or resources to do so.

12 The TAD canister system is only a concept on
13 paper. It faces serious practical barriers, because it
14 would require many utilities to remove spent fuel from
15 secured dry casks in order to put the waste into the TAD
16 canisters.

17 The TAD concept is even more problematic
18 considering that 25 reactor sites lack rail access,
19 requiring waste to be moved by barge or truck. Taking
20 nuclear waste that is safely stored at reactor sites
21 with extremely high security and putting it in unproven
22 canisters to be shipped across our country in trucks and
23 on barges and trains is simply a backwards approach.]

24 [Third, there is significant discrepancies 5
25 between estimated mean annual radiation dose exposures
1 between the FEIS and the Draft SEIS. DOE admits that
2 this is a result of modeling differences and not
3 necessarily a result of improved designs.

4 Thus, the department effectively admits that
5 it's simply -- that it can simply change its assumptions
6 and make the repository look environmentally sound.]
7 And, fourth, [despite the fact that the department can 6
8 change its assumptions in order to manipulate radiation
9 dose data, they continue to refuse to make the Total
10 System Performance Assessment (TSPA) model acceptable[^] to [available]
11 stakeholders like the State of Nevada or NRS to verify
12 DOE's calculations. How can the DOE possibly expect the
13 NRS to adopt the Yucca Mountain EIS if the model used to
14 draft them is kept secret?]

15 [With regard to the Draft Transportation SEIS, 7
16 it's troubling that DOE's analysis fails to adequately
17 consider the impacts that the Caliente Rail Corridor,
18 the department's preferred route, would have on
19 Nevadans. Specifically, DOE has not fully considered
20 land use conflicts with ranching, mining, and recreation

21 in Nevada.]

22 [I'm concerned that the SEIS ignores the vital

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23 impacts that the Caliente Rail Corridor would have on

24 communities existing along rail lines throughout Nevada.]

25 I appreciate the chance to voice these concerns and plan

1 to submit additional comments on each of the

2 Draft SEIS's in writing to the department.

3 Again, [I urge DOE to fully review the public

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4 comments it receives regarding Transportation and Rail

5 SEIS's and provide the consideration that each comment

6 is due, considering the magnitude and long-term impacts

7 of the Yucca Mountain project."] Thank you for your

8 time.